

**IN THE UNITED STATES COURT FOR THE  
NORTHERN DISTRICT OF WEST VIRGINIA**

**AT ELKINS**

**FILED**  
**OCT 20 2000**  
U.S. DISTRICT COURT  
ELKINS WV 26241

**DR. MARSHA CAREY**

**PLAINTIFF,**

**VS.**

**CIVIL ACTION NO.: 2:00 cv 87**

**GUEST SERVICES, INC., a  
Washington District of Columbia  
corporation d.b.a. CANAAN  
VALLEY RESORT AND  
CONFERENCE CENTER**

**DEFENDANT.**

**COMPLAINT**

**I.**

The plaintiff is a citizen and resident of the State of West Virginia; the defendant is a foreign corporation doing business in West Virginia and this Court has jurisdiction based upon diversity of citizenship and the amount in controversy being in excess of \$75,000.00.

**II.**

On or about November 9, 1998, the plaintiff attended an educational conference at the defendant's Canaan Valley Resort and Conference Center in Tucker County, West Virginia and while attending this conference, she incurred serious and disabling injuries of her left ankle and left knee as a result of the defendant's negligence.


**III.**

The defendant so installed, maintained and operated a flooring system so that the same separated causing the plaintiff to fall breaking her left ankle and deranging her left knee.

**IV.**

As a direct and proximate result of the negligence of the defendant, the plaintiff has incurred substantial expenses in and about the care and treatment of her injuries and will in the future incur substantial expenses, has and will suffer pain and discomfort, loss of enjoyment of life, lost wages, suffered loss of earning capacity and said injuries are permanent in nature.

Wherefore plaintiff demands judgment of and from defendant in the sum of \$500,000.00, interest and costs. Plaintiff demands trial by jury.



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